

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

DOCKET FILE COPY ORIGINAL

IN THE MATTER OF

ALLOCATION OF THE
219-220 MHZ. BAND FOR USE BY
THE AMATEUR RADIO SERVICE

ET DOCKET NO 93-40
RM-7747

COMMENTS OF
LEE SUTHERLAND PARR

RECEIVED

JUN 16 1993

FCC MAIL ROOM

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JUN 16 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY


I AM AN AMATEUR ADVANCED CLASS LICENSEE (WA3FNU) OF MANY YEARS
STANDING AND A RETIRED BROADCAST ENGINEER HOLDING AN FCC GENERAL

CHANNEL 13 IS NOT ALLOCATED TO EVERY HAMLET IN THESE UNITED STATES. THERE ARE LARGE SECTIONS OF THE COUNTRY WHERE EVEN HIGH POWER COULD BE USED WITHOUT CAUSING ANY HARM TO TV RECEPTION. ALSO, WE ARE CONSIDERING POINT-TO-POINT COMMUNICATIONS HERE WHICH HAVE LESS CHANCE OF SHOWING UP WHERE THEY ARE NOT WANTED THAN OMNIDIRECTIONAL SIGNALS ---THE PROBLEM WOULD BE WITH HIGH POWER WIDE BAND TELEVISION SIGNALS INTERFERING WITH THE AMATEUR LINKS. METHINKS THAT AMST IS A BIT OVER PROTECTIVE, ESPECIALLY WHEN WE REMEMBER THAT VHF BAND (CHANNELS 2-13) TELEVISION OPERATION IS SCHEDULED TO BE REPLACED BY HDTV DIGITAL TRANSMISSIONS IN THE UHF BAND.

I WOULD BE SO DUMB AS TO SUGGEST THAT THE COMMISSION CAN AVOID INTERFERENCE PROBLEMS (RATHER THAN CREATE HEADACHS) BY OPENING UP THE MAXIMUM SPECTRUM, ALLOWING THE SECONDARY OPERATOR A CHANCE TO CHOOSE THE FREQUENCY THAT WILL PROVIDE THE BEST SERVICE WITH THE LEAST CONFLICT AT THE LOCATION AND UNDER THE OPERATING CIRCUMSTANCES FACED BY THAT PARTICULAR OPERATION.

IS THERE A REGULATORY NEED TO LIMIT THE PROPOSED OPERATIONS TO "DATA"? WHILE THESE FREQUENCIES WILL SUPPORT DATA MODULATION RATES HIGH ENOUGH THAT VOICE CAN BE DIGITIZED AND CARRIED AS "DATA", I CAN SEE NO NEED TO RESTRICT THE USE OF THESE FREQUENCIES TO DIGITAL OPERATION. OPEN UP §97.305(c) TO ALLOW MCW, PHONE, AND IMAGE IN THE PROPOSED BAND. AGAIN, THE GREATER FLEXIBILITY THAT THE OPERATOR HAS THE EASIER CAN HIS PROBLEMS BE SOLVED.

RESPECTFULLY


LEE S. PARR

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12 JUNE 1993